

ANTHONY L. MARTIN, ESQ.

Nevada Bar No. 8177

anthony.martin@ogletreedeakins.com

JILL GARCIA, ESQ.

Nevada Bar No. 7805

jill.garcia@ogletreedeakins.com

BRIAN BRADFORD, ESQ.

Nevada Bar No. 9518

brian.bradford@ogletreedeakins.com

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

Wells Fargo Tower

Suite 1500

3800 Howard Hughes Parkway

Las Vegas, NV 89169

Telephone: 702.369.6800

Fax: 702.369.6888

*Attorneys for Defendants Eldorado Resorts Corporation
and Michael Marrs*

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

COREY WELLS,

Plaintiff,

vs.

ELDORADO RESORTS CORPORATION, a
Florida corporation; MICHAEL MARRS;
BRUCE POLANSKY; KRISTEN BECK;
DOMINIC TALEGHANI; JAMES
GRIMES; AND DOES 1-50, inclusive;

Defendants.

Case No.: 2:15-cv-01006-RFB-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE DISPOSITIVE
MOTIONS AND RESPONSES AND
REPLIES THERETO**

(FIRST REQUEST)

Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1 and 26-4, Plaintiff Corey Wells ("Plaintiff") and Defendants Eldorado Resorts Corporation ("Eldorado") and Michael Marrs ("Marrs") (collectively "Defendants"), by and through their undersigned counsel, hereby stipulate and agree to this first request for extension of time for the parties to file dispositive motions in this action, along with related responses and replies. Pursuant to the Court's July 1, 2016, Order for Extension

of Discovery Deadlines (ECF No. 44), the current deadline for filing dispositive motions in this case is August 30, 2016 (*see id.* at 6). The parties have completed all discovery in this matter, and good cause exists for the proposed extension based upon the following:

On August 11, 2016, the parties participated in an Early Neutral Evaluation Conference (“ENE”) before the Honorable Magistrate Judge George Foley, Jr., in the related case of *Villarreal v. Eldorado Resorts Corp., et al.*, Case No. 2:14-cv-01415-RFB-PAL. (*See* Mins. of Proceedings, ECF No. 97.) Although no settlement was reached, the parties advised the Court that a global settlement conference and continuation of the ENE session would potentially advance the goal of settlement. The Court has, therefore, set a global settlement conference for October 12 and 13, 2016, again before Magistrate Judge Foley. (*See id.*) An extension of the deadline to file dispositive motions, responses, and replies in this case similarly advances the goal of settlement by allowing the parties to conserve resources pending those settlement discussions and to streamline and focus the litigation and issues leading up to that conference. Based upon the foregoing, the parties have agreed that the dispositive motion deadlines should be extended in the following manner:

- Defendants shall file their dispositive motions no later than **September 15, 2016**;
- Plaintiff shall file any response to Defendants' motion no later than **November 15, 2016**;
- Defendants shall file their reply no later than **December 15, 2016**.

//

//

//

//

//

This stipulation is not brought for purposes of delay or any other improper purpose.

Dated this 12th day of August, 2016.

Dated this 12th day of August, 2016.

WATKINS & LETOFSKY, LLP

OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.

/s/ Dan Watkins

/s/ Jill Garcia

Daniel R. Watkins
Brian S. Letofsky
400 S. Fourth Street
Suite 280
Las Vegas, NV 89101
Telephone: 702-385-5191
Attorneys for Plaintiff Corey Wells

Anthony L. Martin
Jill Garcia
Brian Bradford
3800 Howard Hughes Parkway
Suite 1500
Las Vegas, NV 89169
Telephone: 702-369-6800
*Attorneys for Defendants Eldorado Resorts
Corporation and Michael Marrs*

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

August 17, 2016

DATED